

App. No. 10/716,712  
Office Action Dated August 24, 2005

### REMARKS

Favorable reconsideration of this application is requested in view of the above amendments and the following remarks. Claims 10, 22, and 24 are hereby amended. New claims 26-28 are added. Claims 10, 11 and 21-28 are pending. No new matter has been added.

Claim 10 has been amended to recite a plurality of data couplers connected between the data writer and the USB hub. The amendment is supported by the original disclosure, for example Figure 4.

Claim 22 has been amended to recite a plurality of data couplers connected between the data writer and the controller. The amendment is supported by the original disclosure, for example Figure 2.

Claim 24 has been amended to recite a plurality of data couplers connected between the data writer and a plurality of the external communication links. The amendment is supported by the original disclosure, for example Figure 3.

New claims 26-28 are supported by the original disclosure, for example page 14, lines 28-29.

Claims 10 and 11 are rejected under 35 U.S.C 102(e) as being anticipated Klinefelter et al. (US 2002/0180993). Applicants respectfully traverse this rejection.

Klinefelter et al. does not teach a plurality of data couplers connected between a data writer and a USB hub as recited in claim 10. The rejection suggests that the function of the couplers can be read broadly and can be regarded as controllers. Without agreeing with this characterization, Klinefelter discloses a single controller 22B connected between the hub 28 and the print mechanism 24B, and a single controller 22D connected between the hub 28 and the data encoder 24D. In Klinefelter, each controller controls the corresponding processing device independently of the other controllers. Page. 2, para. [0013]. Klinefelter does not teach a plurality of data couplers connected between a single data writer and a USB hub.

Therefore, Klinefelter does not anticipate claim 10. Claim 11 is patentable along with claim 10 from which it depends. Applicants are not conceding the correctness of the rejection as

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applied to claim 11. Favorable reconsideration and withdrawal of the rejection are respectfully requested.

Claims 22 and 24 are rejected under 35 U.S.C 103(a) as being unpatentable over Klinefelter et al. Applicants respectfully traverse this rejection.

Both claims 22 and 24 are directed to a desktop card printer. In claim 22, a plurality of data couplers are connected between the data writer and the controller. In claim 24, a plurality of data couplers are connected between the data writer and a plurality of the external communication links.

Klinefelter et al. does not teach a plurality of data couplers connected between a single data writer and the controller (claim 22) or between a single data writer and a plurality of external communication links (claim 24). Klinefelter et al. disclose having each data writer controlled by a corresponding controller. See Page 2, paras. [0013] and [0021]. Assuming that a controller is equivalent to a data coupler as alleged in the rejection, which Applicants do not concede, Klinefelter et al. still does not teach or suggest a plurality of data couplers connected between a single data writer and the controller (claim 22) or a plurality of external communication links (claim 24). As a result, a prima facie case of obviousness has not been established.

With respect to claim 24, Applicants disagree with the conclusion that modifying Klinefelter et al. to include a second or third port would have been obvious to a person having ordinary skill in the art. The rejection asserts that Klinefelter et al. "can...be simply modified" and that such a modification would be operative. However, the fact that a reference "can" be modified does not render the invention obvious unless the prior art contains a suggestion or motivation for making the proposed modification. MPEP 2143.01. The rejection does not contain any explanation as to how Klinefelter et al. teaches, suggests or motivates such a proposed modification. As a result, a prima facie case of unpatentability with respect to claim 24 has not been established.

For at least these reasons, Applicants respectfully submit that claims 22 and 24 are patentable over the cited reference. Favorable reconsideration and withdrawal of the rejection are respectfully requested.

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Claims 21, 23, and 25 are considered allowable if rewritten in independent form. However they should be reconsidered allowable for at least the same reasons as claims 10, 22, and 24, from which they depend, respectively. New claims 26-28 are patentable along with claims 10, 22 and 24.

In view of the above, favorable reconsideration in the form of a notice of allowance is requested. Any questions regarding this communication can be directed to the undersigned attorney, James A. Larson, Reg. No. 40,443, at (612) 455-3805.

Respectfully Submitted,

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By



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